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7 Attorneys for Creditor  
8 CHURCH OF SCIENTOLOGY INTERNATIONAL

9 UNITED STATES BANKRUPTCY COURT  
10 NORTHERN DISTRICT OF CALIFORNIA

11 In re	)	Case No. 95 10911
	)	
12 GERALD ARMSTRONG,	)	Chapter 7
	)	
13 Debtor.	)	
	)	
14 CHURCH OF SCIENTOLOGY INTERNATIONAL,	)	Adv. No. 95 1164
a California non-profit religious	)	
15 corporation,	)	NOTICE OF DEPOSITION DUCES
	)	TECUM
16 Plaintiff,	)	
	)	
17 v.	)	
	)	
18 GERALD ARMSTRONG,	)	
	)	
19 Defendant.	)	
	)	

20  
21 TO EACH PARTY AND TO EACH ATTORNEY OF RECORD IN THIS ACTION:  
22 YOU ARE HEREBY NOTIFIED THAT THE DEPOSITION OF Gerald Armstrong  
23 Corporation (the "Deponent") will be taken at Wilson, Ryan &  
24 Campilongo, 115 Sansome Street, 4th Floor, San Francisco,  
25 California, commencing at 10:00 a.m. on January 11, 1996 and  
26 continuing from day to day thereafter.

27 YOU ARE FURTHER NOTIFIED THAT:

28 The Deponent is not a party to this action. So far as known to

1 the deposing party, the Deponent's address and telephone number are  
2 as follows:

3 Gerald Armstrong Corporation  
4 715 Sir Francis Drake Blvd.  
5 San Anselmo, CA 94960-1949

6 Said deponent has been served with a Deposition Subpena. A COPY OF  
7 THE DEPOSITION SUBPOENA IS ATTACHED HERETO AND SERVED HEREWITH.

8 A list of all parties or attorneys for parties on whom this  
9 Notice of Deposition is being served is shown on the accompanying  
10 Proof of Service.

11 Dated: 1/4, 1996

Respectfully submitted,

12 WILSON, RYAN AND CAMPILONGO

13 By: 

14 Jason S. Cohen

15 Laurie J. Bartilson  
16 BOWLES & MOXON

17 Attorneys for Plaintiff  
18 CHURCH OF SCIENTOLOGY  
19 INTERNATIONAL  
20  
21  
22  
23  
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28



PROOF OF SERVICE

I declare that I am employed in the City and County of San Francisco, California.

I am over the age of eighteen years and not a party to the within entitled action. My business address is 115 Sansome Street, Suite 400, San Francisco, California.

I am readily familiar with Wilson, Ryan & Campilongo's practice for collection and processing of correspondence for hand delivery and by mail with the United States Postal Service.

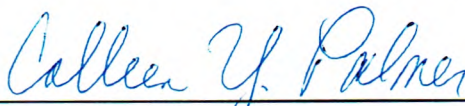
On January 4, 1996, I served the attached **NOTICE OF DEPOSITION DUCES TECUM** on the following in said cause, by placing for deposit with Lightning Express Messenger Service on this day in the ordinary course of business, true copies thereof enclosed in sealed envelopes. The envelopes were addressed as follows:

Office of the United States Trustee 250 Montgomery St., Ste. 1000 San Francisco, CA 94104	Linda Sorenson, Esq. FELDMAN, WALDMAN & KLINE 235 Montgomery St. San Francisco, CA 94104-3160
--	--

I served the attached on the following in said cause, by placing for delivery with the United States Postal Service on this day in the ordinary course of business, true copies thereof. The envelope was addressed as follows:

Jeffrey G. Locke, Trustee  
P.O. Box 488  
Kentfield, CA 94914-0488

I declare under the penalty of perjury pursuant to the laws of the State of California that the foregoing is true and correct and that this Proof of Service was executed on January 4, 1996 at San Francisco, California.

  
Colleen Y. Palmer

PROOF OF SERVICE

I declare that I am employed in the City and County of San Francisco, California.

I am over the age of eighteen years and not a party to the within entitled action. My business address is 115 Sansome Street, Suite 400, San Francisco, California.

I am readily familiar with Wilson, Ryan & Campilongo's practice for collection and processing of correspondence for hand delivery.

On January 4, 1996, I served the attached **NOTICE OF DEPOSITION DUCES TECUM** on the following in said cause, by placing for deposit with L & L Legal on this day in the ordinary course of business, true copies thereof enclosed in a sealed envelope. The envelope was addressed as follows:

Gerald Armstrong  
715 Sir Francis Drake Blvd.  
San Anselmo, CA 94960-1949

I declare under the penalty of perjury pursuant to the laws of the State of California that the foregoing is true and correct and that this Proof of Service was executed on January 4, 1996 at San Francisco, California.

  
Colleen Y. Palmer



# United States Bankruptcy Court

DISTRICT OF \_\_\_\_\_

In re Gerald Armstrong ,  
Debtor  
Church of Scientology International  
Plaintiff  
V.  
Gerald Armstrong,  
Defendant

## SUBPOENA DUCES TECUM IN AN ADVERSARY PROCEEDING

Case No. 95-10911 AJChapter 7Adv. Proc. No. 95-1164

To: Gerald Armstrong Corporation

☐ YOU ARE COMMANDED to appear in the United States Bankruptcy Court at the place, date, and time specified below to testify in the above adversary proceeding.

PLACE

COURTROOM

DATE AND TIME

☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above adversary proceeding.

PLACE

DATE AND TIME

☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

See Attachment "A" Hereto.

PLACE

Wilson, Ryan & Campilongo  
115 Sansome Street, Suite 400  
San Francisco, CA 94104 (415) 391-3900

DATE AND TIME

Jan. 11, 1996  
10:00 a.m.

☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

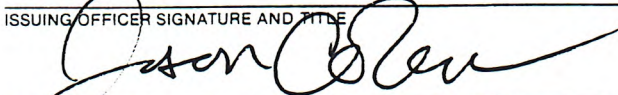
PREMISES

DATE AND TIME

Any subpoenaed organization not a party to this adversary proceeding shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify, Fed.R.Civ.P. 30(b)(6) made applicable in adversary proceedings by Rule 7030, Fed.R.Bankr.P.

ISSUING OFFICER'S SIGNATURE AND TITLE

DATE

 SBN: 175900

1/3/96

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

Jason S. Cohen, Esq., Wilson, Ryan & Campilongo  
115 Sansome St., Suite 400, San Francisco, CA 94104 (415) 391-3900



**ATTACHMENT A****DEFINITIONS AND EXPLANATIONS:**

1  
2  
3 1. As used herein, the term "document" includes all written,  
4 typewritten, printed and graphic materials of whatever kind or  
5 nature, including, but not limited to, correspondence, notes,  
6 memoranda, telegrams and cables, telexes, telecopies, panafaxes,  
7 publications, contracts, agreements, insurance policies, minutes,  
8 offers, analyses, projections, studies, books, papers, records,  
9 reports, lists, calendars, diaries, statements, complaints, filings  
10 with any court, tribunal or governmental agency, corporate minutes,  
11 partnerships, agreements, ledgers, transcripts, summaries, agendas,  
12 bills, invoices, receipts, estimates, evaluations, personnel files,  
13 certificates, instructions, manuals, bulletins, advertisements,  
14 periodicals, accounting records, checks, check stubs, check  
15 registers, canceled checks, money orders, negotiable instruments,  
16 sound recordings, films, photographs, mechanical or electronic  
17 recordings, tapes, transcriptions, blueprints, computer programs  
18 and data, data processing cards, computer disks, software, logs,  
19 email, news postings, instruction manuals, x-rays, laboratory  
20 reports and all other medical tests and test results, whether in  
21 draft or otherwise, including but not limited to, copies and non-  
22 identical copies (whether different from the originals because of  
23 notes or marks made on or attached to said copies or otherwise).

24 2. The words "and" and "or" as used herein shall both mean  
25 "and/or."

26 3. The term "you" as used herein means GAC, its officers,  
27 directors, employees, agents and attorneys.  
28

4. If in response to this Deposition notice you decline or



1 refuse to produce any document based upon a claim of privilege, at  
2 the time of production of these records, you are to state in  
3 writing with respect to each such document the following:

4 (a) An identification of the document with reasonable  
5 specificity and particularity, including its nature  
6 (memo, letter, etc.), title and date;

7 (b) The exact nature of the privilege asserted;

8 (c) All of the facts upon which your claim of privilege  
9 is based or which supports said claim;

10 (d) With respect to each person who was present at the  
11 time the document was prepared:

12 (1) Their name and last known business and  
13 residential addresses, telephone numbers, and email  
14 addresses or aliases; and

15 (2) Their employer and job title or capacity at the  
16 time that the document was prepared;

17 (e) With respect to each individual and entity to whom  
18 the original or a copy of the document was sent:

19 (1) their name and last known business and  
20 residential addresses, telephone numbers and email  
21 addresses or aliases; and

22 (2) Their employer and job title or capacity at the  
23 time that the original or the copy of the document was  
24 sent to them;

25 (3) The date(s) when the document or copy was sent;  
26 and

27 (4) By whom the document or copy was sent;

28 (f) With respect to each individual and entity who, to

1 the best of your knowledge, information or belief, has  
2 seen the original or any copy of the document:

3 (1) Their name and last known business and  
4 residential addresses, telephone numbers, and email  
5 addresses or aliases;

6 (2) Their employer and job title or capacity at the  
7 time the document or copy was seen by them; and

8 (3) The date(s) when the document or copy was seen  
9 by them;

10 (g) With respect to each individual or entity who, to  
11 the best of your knowledge, information or belief, had  
12 possession or custody of the original or any copy of the  
13 document:

14 (1) The name and last known business and residential  
15 addresses, telephone numbers, and email addresses or  
16 aliases;

17 (2) The inclusive dates during which they had  
18 possession or custody of the document or copy; and

19 (3) Their employer and job title or capacity at the  
20 time that they had possession of the document or copy;  
21 and

22 (h) Identify with reasonable particularity each  
23 document which refers to, discusses, analyzes, or  
24 comments upon the document which you claim is privileged,  
25 or which contains any and all of its contents.



DOCUMENTS AND THINGS TO BE PRODUCED

1. The articles of incorporation of The Gerald Armstrong Corporation (hereinafter "GAC").

2. The bylaws of GAC.

3. All documents reflecting GAC's financial condition from January 1, 1987 to the present. Such documents shall include but not be limited to financial statements, profit and loss statements, income and expense statements, asset statements, balance sheets and loan applications.

4. All documents reflecting payments to GAC from any source for any reason from January 1, 1987 to the present.

5. All documents reflecting the names, addresses and telephone numbers of the locations at which GAC's banking accounts are maintained.

6. All documents which refer to, relate to, mention, discuss, concern or evidence, without limitation, any stock offering made by GAC from January 1, 1987 until the present.

7. All documents which refer to, relate to, mention, discuss, concern or evidence, without limitation, any transfer of shares in GAC made by anyone from January 1, 1987 until the present.

8. All documents which refer to, relate to, mention, discuss, concern or evidence, without limitation, any transfer of assets, including personal property from Gerald Armstrong to GAC from January 1, 1987 until the present.

9. All documents which refer to, relate to, mention, discuss, concern or evidence, without limitation, any loans made to GAC by any person from January 1, 1987 until the present.



1       10. All documents, including loan applications, relating to  
2 any loans secured by GAC at any time.

3       11. All documents evidencing or reflecting payments on any  
4 loans secured by GAC.

5       12. All documents which refer to, relate to, mention,  
6 discuss, concern or evidence, without limitation, any loans made by  
7 GAC to any person from January 1, 1987 until the present.

8       13. All documents reflecting the names and titles of all  
9 employees who worked for GAC from January 1, 1987 to the present.

10       14. All documents reflecting the names of the officers and  
11 directors of GAC from January 1, 1987 to the present.

12       15. All documents which refer to, relate to, mention,  
13 discuss, concern or evidence, without limitation, any payments made  
14 by GAC to Gerald Armstrong from January 1, 1987 until the present.

15       16. All documents comprising, evidencing or relating to any  
16 agreements between GAC and Gerald Armstrong at any time.

17       17. All documents comprising, evidencing or relating to the  
18 lease or rental of any real property by GAC from January 1, 1987 to  
19 the present.

20       18. All documents comprising, evidencing or relating to the  
21 purchase of any real property by GAC from January 1, 1987 to the  
22 present.

23       19. All documents comprising or relating to payments made,  
24 including checks or money orders or other documentation of payments  
25 for the lease or rental of any real property by GAC from January 1,  
26 1987 to the present.

27       20. All documents comprising, evidencing or relating to  
28 payments made, including checks or money orders or other



1 documentation of payments toward the purchase of any real property  
2 by GAC from January 1, 1987 to the present.

3 21. All documents comprising, evidencing or reflecting bills  
4 or invoices, and payments thereon, for maintenance of any real  
5 property owned, leased or rented by GAC.

6 22. All documents comprising, evidencing or relating to  
7 payments to any utility companies for the utilities at any real  
8 property owned, rented or leased by GAC.

9 23. All documents reflecting the names, addresses and  
10 telephone numbers of all accountants, accounting firms and other  
11 persons or businesses that GAC retained to manage, analyze, monitor  
12 or keep records of its business and financial affairs and assets,  
13 from January 1, 1987 to the present.

14 24. All documents which refer, relate, mention, discuss,  
15 concern or evidence, without limitation, any payments made by GAC  
16 to anyone on behalf of Gerald Armstrong from January 1, 1987 until  
17 the present.

18 25. All documents which refer to, relate to, mention,  
19 discuss, concern or evidence, without limitation, any property,  
20 cash or other asset paid to GAC, of any kind whatsoever, in  
21 exchange for every transfer of cash and/or shares of stock in GAC  
22 made by Gerald Armstrong.

23 26. All documents which concern, evidence or reflect the  
24 assets of GAC from January 1, 1987 to the present.

25 27. All documents which concern, evidence, reflect or  
26 constitute the literary works owned or in the possession of GAC.

27 28. All documents which concern, evidence, reflect or  
28 constitute the inventions or rights to inventions which are owned

1 or in the possession of GAC.

2 29. All documents which concern, evidence, reflect or  
3 constitute the manuscripts, screen plays, motion picture  
4 treatments, "fictionalizations", plays, articles or scripts which  
5 are owned or in the possession of GAC.

6 30. All documents which concern, evidence, reflect or  
7 constitute the artistic works which are owned or in the possession  
8 of GAC.

9 31. All documents which concern, evidence, reflect or  
10 constitute the formulas or rights to formulas which are owned or in  
11 the possession of GAC.

12 32. All documents evidencing or relating to the issuance of  
13 stock by GAC.

14 33. All minutes of any meetings of the board of directors of  
15 GAC from January 1, 1987 to the present.

16 34. All documents concerning, evidencing, relating or  
17 constituting any appraisal of all or part of the assets owned or in  
18 the possession of GAC from January 1, 1987 to the present.

19 35. All documents evidencing or relating to the sale of any  
20 assets owned or in the possession of GAC from January 1, 1987 to  
21 the present.

22 36. All documents identifying, evidencing or relating to any  
23 creditors of GAC from January 1, 1987 to the present.

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